

EXHIBIT 1

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Acting Under Authority Conferred by 28 U.S.C. § 515

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 18-577 CRB
)	
Plaintiff,)	UNITED STATES' REVISED NOTICE
)	PURSUANT TO FEDERAL RULE OF EVIDENCE
v.)	404(b)
)	
MICHAEL RICHARD LYNCH AND)	Trial Date: March 18, 2024
STEPHEN KEITH CHAMBERLAIN,)	Pretrial Conference: February 21, 2024
)	
Defendants.)	

Pursuant to the Court's June 30, 2023 Scheduling Order, and Federal Rule of Evidence 404(b), the United States respectfully gives notice that it intends to offer at trial the following evidence:

At a meeting with Defendant Michael Lynch and others in 2008, Daud Khan was threatened Autonomy would "take steps" if he published a research note. See, e.g., US_FBI_E-00013468; Hussain Trial. Tr. at 2986-88. After the meeting Autonomy was going to give alleged evidence of wrongdoing by Khan to the United Kingdom's Financial Services Authority if Khan published a research note. See US_FBI_E-00013469; Hussain Trial Tr. at 2992-95. Khan was prohibited from attending analyst

conference calls from Q2 2008 through 2009. See US_FBI_E-00013470; Hussain Trial Tr. at 2992-95. Lynch also caused Brent Hogenson, Percy Tejada, and Reena Presad to be fired and approved settlements of potential whistleblower claims by them. See, e.g., Hussain Trial Tr. at 2618-48. In addition, Autonomy, with Chamberlain's knowledge, made false and misleading statements in letters to the Financial Reporting Review Panel of the Financial Reporting Council between 2010 and 2011. See, e.g., Hussain Trial Tr. at 4913-79.

The foregoing evidence is relevant to show intent, preparation, plan, knowledge, absence of mistake, and lack of accident. Lynch's threats to analysts and retaliation against whistleblowers evidence his intent to deceive and defraud and consciousness of guilt. Chamberlain's lies to regulators evidence his intent to deceive and defraud and consciousness of guilt.

The United States reserves the right to change, modify, or supplement this notice as it prepares for trial.

DATED: December 15, 2023

Respectfully submitted,

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